

revealed that JPMorgan financially profited from the deposits made by Epstein and Epstein-controlled entities located in the Virgin Islands and from the business opportunities referred to JPMorgan by Epstein and his co-conspirators in exchange for its known facilitation of and implicit participation in Epstein’s sex trafficking venture.

Upon information and belief, Larry Page—the co-founder and co-owner of Alphabet Inc. (Google LLC’s parent company)—is a high-net-worth individual who Epstein may have referred or attempted to refer to JPMorgan. Mr. Page announced in 2019 that he was stepping down as CEO of Google LLC and Alphabet but would “remain actively involved” as a Board Member, Shareholder, and Co-Founder. *See* Alphabet Inc., *Alphabet management change* (Dec. 3, 2019), <https://abc.xyz/investor/news/releases/2019/1203/> (attached as Exhibit 1). The Government issued a subpoena for documents to Mr. Page on April 11, 2023 (attached as Exhibit 2). The Government made good-faith attempts to obtain an address for Larry Page, including hiring an investigative firm to search public records databases for possible addresses. Declaration of Mimi Liu (“Liu Decl.”), ¶ 2 (attached as Exhibit 3). Our process server attempted service at the addresses identified by our investigative firm, but discovered the addresses were not valid for Mr. Page. Liu Decl., ¶ 3; Due Diligence Affidavits of Andrey Alekseev and Douglas Henry (collectively attached as Exhibit 4).

This Court long has recognized that Rule 45 of the Federal Rules of Civil Procedure permits alternative service of a subpoena by certified mail where a party is unable to provide personal service “[i]n accordance with the interpretive principle that the rules ‘be construed and administered to secure the just, speedy, and inexpensive determination of every action.’” *Cordius Trust v. Kummerfeld*, 45 Fed. R. Serv. 3d 1151, 2000 WL 10268, at *2 (S.D.N.Y. Jan. 3, 2000) (quoting Fed. R. Civ. P. 1). The Court has permitted alternative service where a party’s repeated

attempts at personal service have failed, *see SEC v. David*, No. 19-cv-9013, 2020 WL 703464, at *1-2 (S.D.N.Y. Feb. 12, 2020) (Rakoff, J.), or where there is an “approaching close of discovery,” *In re Petrobras Securities Litig.*, No. 14-CV-9662, 2016 WL 908644, at *1-2 (S.D.N.Y. March 4, 2016) (Rakoff, J.) (authorizing alternative service by email and overnight mail 56 days before April 29, 2016 discovery end date).

Both circumstances are present here. The Government has made good-faith efforts to obtain an address for Mr. Page and to serve a subpoena upon him personally. Moreover, the fact-discovery end date is at the end of this month. In these circumstances, the Court should in the interest of securing just and expeditious resolution authorize the Government to provide alternative service by serving Mr. Page by service upon Alphabet Inc.’s registered agent.

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ARIEL SMITH, ESQ.
ATTORNEY GENERAL NOMINEE

By counsel,

/s/ Mimi Liu

Mimi Liu (*pro hac vice*)
Linda Singer (*pro hac vice*)
David I. Ackerman
Paige Boggs (*pro hac vice*)
MOTLEY RICE LLC
401 9th Street NW, Suite 630
Washington, DC 20004
Tel: (202) 232-5504
Fax: (202) 232-5513
lsinger@motleyrice.com
mliu@motleyrice.com
dackerman@motleyrice.com
pboggs@motleyrice.com

VENETIA VELAZQUEZ
Admitted *Pro Hac Vice*
Acting Chief, Civil Division
Virgin Islands Department of Justice
Office of the Attorney General
213 Estate La Reine, RR1 Box 6151